

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA

3:13-CR-00407-MO

v.

AMENDED INFORMATION
18 U.S.C. § 666(a)(1)(A)

LAURA DUNN,

Defendant.

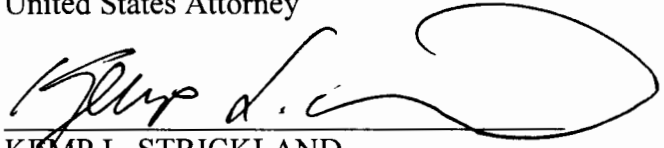
THE UNITED STATES ATTORNEY CHARGES:
(THEFT OF A PROGRAM RECEIVING FEDERAL FUNDS)
18 U.S.C. § 666(a)(1)(A)

Beginning about January of 2011, and continuing through on or about May 17, 2012, within the District of Oregon, LAURA DUNN, defendant herein, being a registered nurse and agent of Heart of Hospice, an organization receiving in the one year period beginning January 2011 to January 2012 federal benefits in excess of \$10,000 under the Federal Medicare Program - Part A, did embezzle, steal, obtain by fraud, knowingly convert to her own use without authority, and intentionally misapply, property worth at least \$5,000 that was owned by and under the care, custody, and control of Heart of Hospice, in violation of Title 18, United States Code, § 666(a)(1)(A).

Dated this 19th day of September 2013.

Respectfully submitted,

S. AMANDA MARSHALL
United States Attorney


KEMP L. STRICKLAND
Assistant United States Attorney